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Complaint Regarding Postal Service Offering DOCKET # MC2012-26 ENHANCED SERVICES PRODUCT FOR COMPETITIVE PO BOXES

COMMENTS OF Carolyn C. Bream (retired owner of The Mail Room) July 19, 2012

I am the now retired owner of a small business that was a Certified Mail Receiving Agency (CMRA) and for 7-10 years of the 20 years I owned it a Contract Postal Unit (old style contract). I had a very good relationship with our local Post Office not only with mailbox rentals, but also with shipping choices. I have some comments about the United States Postal Service venturing into additional services for their PO Boxes. Even though it has been determined that those boxes are competitive with Private Mail Boxes (PMB)'s, there are differences between PO Boxes and the private mailboxes that a mail and parcel center offers. Some of these differences are mandated by the USPS (accepting mail for 6 months after a customer has left, not allowing PMB customers to file change of address from our locations, and no free forwarding of mail) already giving some advantage to the USPS. The enhancements extend these unfair advantages.

Email notification service, being offered by the USPS, is a new service. The USPS has not been specifically notifying their PO Box customers of mail in the past. The service requires labor and technology to implement and maintain. These items have a cost and to say they are included in the base cost of a PO Box, when the service is new, contradicts the statements made by the USPS that they are already providing these services and that they are bundled into the PO Box rental fee. If the services were available in the past this might be true, but as a new service there is a clear difference between the past and present.

The second new service that is now available is street addressing for private carrier delivery to the PO Box. I have a few objections to this.

- 1: The USPS claims that some companies will not deliver their products to a PO Box due to fraud. By masking the actual PO Box with a street address USPS is assisting in deceiving the merchants that they are not shipping goods to a PO Box. This was the argument that the USPS used when forcing CMRA's to use the PMB designations and # signs for their boxes rather than the old 'suite' #'s. Now will the USPS deceive merchants and individuals alike in the same manner? Once it becomes common knowledge that the USPS is using the # sign to mask their PO Boxes, CMRA addressing again will become unfairly suspect.
- 2: The acceptance of the packages at the street address causes a conflict with the USPS policy and procedures of getting a signature for accountable, insured, and registered mail products. The expectation and legal right of the mailer is being misused and deceived by the blanket acceptance form the USPS will require for the acceptance of mail at the street address. Is this release sufficient to maintain the high standards of the registered mail piece, or the court recognized certified mail piece or even the USPS own standards for the insured mail piece?
- 3: There are costs involved in offering these services. These include the logistics of moving these pieces within the Post Office from reception to delivery, the time at the retail counter to help the customer fill out the forms, the database support, the physical storage of the pieces, and the retrieval and handling of them when the customer comes in to pick them up. When there are costs, there needs to be postage to cover those costs. I cannot hand mail, directed to the local postmaster, to my letter carrier for internal delivery to a postmaster without placing a stamp on it, so everything handled by USPS personnel needs some sort of postage. While there has been a 25% increase in pricing nothing in the USPS filing shows a breakdown of costs to prove that the costs of implementing these specific new additional services is covered by the increase.

Furthermore, email notification and street addressing as premium service doesn't seem to be what the public wants. In my experience the PO Box customer wants the cheapest place to receive their mail and generally know what time mail is put out. These services are adding costs to people and businesses who are value purchasers rather than convenience and service customers. This may be the reason 66,000 USPS mailbox customers have canceled or not renewed since the program and pricing went into effect.

For all the reasons I have outlined I feel that these services are not only hurting the mail and parcel center industry, but also, not benefitting the USPS and in fact may further damage the high standards of the USPS.

Thank you for your consideration on this matter.

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